

UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE UNITED STATES TRUSTEE
KELLY BEAUDIN STAPLETON
UNITED STATES TRUSTEE, REGION 3
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re: :
SHAPES/ARCH HOLDINGS, L.L.C. : Chapter 11
et al., : Case No. 08-14631 (GMB)
Debtors. : Hearing Date:
: _____

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION OF THE UNITED STATES TRUSTEE FOR
AN ORDER DIRECTING THE APPOINTMENT OF A
CHAPTER 11 TRUSTEE PURSUANT TO 11 U.S.C. § 1104**

TO: ALL PERSONS ON ATTACHED CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that the United States Trustee will move before the Honorable Gloria M. Burns on May ____, 2008 at _____ a.m., or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, 401 Market Street, Camden, NJ 08101, for an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104 and for such other and further relief as this Court deems just and appropriate.

PLEASE TAKE FURTHER NOTICE that the United States Trustee will rely upon the Certification of Tina Oppelt and the Memorandum of Law attached hereto at the hearing.

PLEASE TAKE FURTHER NOTICE that any papers in opposition to the Motion must be filed with the Court and served upon the United States Trustee no later than May ___, 2008. If opposing papers are not filed and served within the required time, the Motion shall be deemed uncontested pursuant to District of New Jersey Local Bankruptcy Rule 9013-1(a) and an Order Directing The Appointing of a Chapter 11 Trustee, may be signed and entered in the Court's discretion.

PLEASE TAKE FURTHER NOTICE that pursuant to District of New Jersey Local Bankruptcy Rule 9013-1(f), oral argument is requested.

KELLY BEAUDIN STAPLETON
UNITED STATES TRUSTEE
REGION 3

/s/ Donald F. MacMaster
Donald F. MacMaster
Trial Attorney

DATED: Newark, New Jersey
April 30, 2008